

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

OLAPLEX, LLC, a California limited liability company, and LIQWD, INC., a California corporation,

Plaintiffs,

v.

ALKAM INTERNATIONAL, INC. and ALLEN CHONG d/b/a "Riverside Beauty" and "UNICO Enterprises"; KRISCO SALES LLC and HEALTHY AND BEAUTY MARKETING GROUP INC. d/b/a "101 Beauty Store"; and PERFUME BEAUTY INC.

Defendants.

Case No. 2:18-cv-09050-FMO (SKx)

**APPROVED  
FINAL JUDGMENT AND PERMANENT  
INJUNCTION UPON CONSENT**

Plaintiffs OLAPLEX, LLC. and LIQWD, INC. ("Plaintiffs") and defendants Alkam International, Inc. and Allen Chong d/b/a "Riverside Beauty" and "UNICO Enterprises" (hereinafter collectively referred to as "Defendants") having agreed that a Final Judgment and Permanent Injunction Upon Consent ("Final Judgment") should be entered between them and good cause appearing therefore:

1. Plaintiffs asserted this action for trademark counterfeiting, 15 U.S.C. § 1114; trademark infringement, 15 U.S.C. § 1114; unfair competition, false designation of origin and false description,

1 15 U.S.C. § 1125(a); trademark dilution, 15 U.S.C. § 1125(c); and statutory and common law unfair  
2 competition, California Business & Professions Code § 17200. The Court further has continuing  
3 jurisdiction to enforce the terms and provision of this Final Judgment.

4 2. Plaintiff Olaplex, LLC is a corporation organized and existing under the laws of the state  
5 of California, having its principal place of business at 1482 E. Valley Rd., Suite #701, Santa Barbara,  
6 California 93108.

7 3. Plaintiff LIQWD, Inc. is a corporation organized and existing under the laws of the state  
8 of California, having its principal place of business at 1482 E. Valley Rd., Suite #701, Santa Barbara,  
9 California 93108.

10 4. Defendant Alkam International, Inc. is a corporation organized and existing under the laws  
11 of the state of California, having a principal place of business at 1443 E Washington Blvd, Unit 204,  
12 Pasadena, CA 91104. Defendant Alkam International, Inc. conducts business under the fictitious  
13 business names “Riverside Beauty” and “UNICO Enterprises”  
14

15 5.

16 6. Plaintiff LIQWD, Inc. is the owner of the federally registered: **OLAPLEX®** trademark  
17 under US Trademark Registration No. 4,553,436; No. 4,557,585 for **BOND MULTIPLIER®**; and  
18 No. 4,682,909 for **BOND PERFECTOR®** (collectively, the “Olaplex Trademarks”).

19 7. Defendants agree that the jurisdiction of this Court is retained for the purpose of making  
20 any further orders necessary or proper for the construction, implementation or modification of this  
21 Final Judgment, the enforcement and the punishment of any violations thereof.

22 **IT IS ORDERED, ADJUDGED AND DECREED**

23 8. The Final Judgment shall be binding upon and shall inure to the benefit of the parties and their  
24 respective heirs, successors and assigns, and acquiring companies.  
25

9. Defendants, their agents, servants, employees and all persons acting in concert and participation with them, and their successors and assigns, jointly and severally be and hereby are, permanent restrained and enjoined from:

- a) Knowingly using any counterfeit or infringement of the Olaplex Trademarks to identify any goods not authorized by Plaintiffs;
- b) counterfeiting or infringing the Olaplex Trademarks by knowingly importing, manufacturing, distributing, selling, offering for sale, advertising, promoting, displaying any products bearing any simulation, reproduction, counterfeit, or copy of the (current as of November 15, 2019) Olaplex Trademarks;
- c) engaging in any other conduct constituting an infringement of the Olaplex Trademarks, of Plaintiffs' rights in, or to use or to exploit, said trademark,
- d) making, importing, distributing, offering to sell, or selling any past or current (as of November 15, 2019) Olaplex branded product.

10. This Final Judgment shall be deemed served upon the Defendants at the time of the execution by the Court.

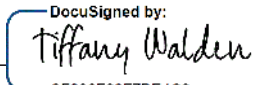
11. This action against Defendants is hereby dismissed with prejudice.

**CONSENTED TO BY THE PARTIES:**

The undersigned hereby consent to the entry of the Final Judgment in the form annexed hereto or in such other form as the Court may approve.

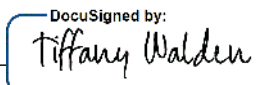
Dated: 12/23/2019, 2019

**OLAPLEX, LLC.**

By: \_\_\_\_\_  
DocuSigned by:  
  
CF802F23F7BE4C2...  
Tiffany Walden  
Name: \_\_\_\_\_  
Title: Chief Administrative Officer / Ch

Dated: 12/23/2019, 2019

**LIQWD, INC.**

By: \_\_\_\_\_  
DocuSigned by:  
  
CF802F23F7BE4C2...  
Tiffany Walden  
Name: \_\_\_\_\_

Title: Chief Administrative Officer / Chief

Dated: 12/26/2019, 2019

**ALKAM INTERNATIONAL, INC.**

By: 

Name: Allen Chong

Title: President

Dated: 12/26/2019, 2019

**ALLEN CHONG**  
By: 

SO ORDERED:

January 14, 2020, ~~2019~~

/s/ Fernando M. Olguin

United States District Court Judge